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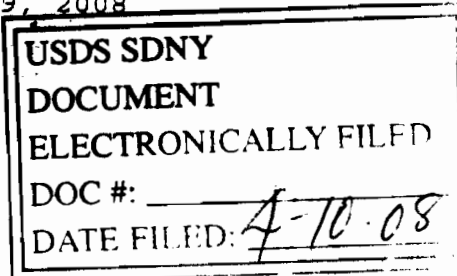
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April 9, 2008

BY FAX: 212-805-6382

Hon. Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: Civil Action No.: 07 Civ. 2395 (VM)
Micalden Investments S.A. v. Olga
Rostropovich, Cooley Godward Kronish LLP,
Renee Schwartz, Atoosa P. Mamdani and Mahmoud
A. Mamdani

Dear Judge Marrero:

We were recently retained by defendant Olga Rostropovich and filed our Notice of Appearance on behalf of Ms. Rostropovich on April 4, 2008, following Your Honor's order permitting, Ms. Rostropovich's former counsel, Gilbert Goldman, Esq. to withdraw and my firm to be substituted in place of Mr. Goldman.

Pursuant to Your Honor's rules, I respectfully request a pre-motion conference to consider my proposed Rule 4 application for an extension of time to serve Ms. Rostropovich's answer to the plaintiff's Second Amended Complaint. My partner, Declan P. Redfern has spoken to plaintiff's counsel, who consents to our request for an extension until April 30, 2008. I have attempted to reach other counsel but have spoken only to Avery S. Mehlman, Esq., counsel for Atoosa P. Mamdani and Mahmoud A. Mamdani, who also consents to my request.

I do appreciate that there is a so ordered stipulation in effect granting a previous request of the defendants for an extension of time until April 10, 2008, for defendants to serve their answers to the Second Amended Complaint. However, we have been attempting since our retention to piece together a full file, including the prior proceedings in State Supreme Court, New York County, which we believe is a pending proceeding providing a venue for our client to seek an order nullifying and/or

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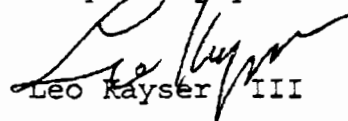
cancelling nunc pro tunc the Plaintiff's asserted security interest.

I further understand that a certain Order dated March 17, 2004, (Honorable Emily Jane Goodman) vacated a Consent Judgment filed by Ms. Rostropovich's former husband, Olaf Guerrand-Hermes, in favor of the plaintiff herein, purportedly securing the indebtedness claimed by plaintiff in the Second Amended Complaint.

The Appellate Division, First Department by Decision and Order dated June 29, 2006, remanded the case to the Justice Goodman for an evidentiary hearing to determine if the consent judgment vacated by Justice Goodman on the basis of a fraudulent conveyance in violation of New York Debtor Creditor Law was supported by the evidence.

For the aforesaid reasons, I respectfully seek leave of the Court to file an application for a further extension of time up to and including April 30, 2008, to file an answer on behalf of Ms. Rostropovich.

Very truly yours,


Leo Kayser III

LK:dm

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